

PHA 5-Year and Annual Plan	U.S. Department of Housing and Urban Development Office of Public and Indian Housing	OMB No. 2577-0226 Expires 4/30/2011
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1.0	PHA Information PHA Name: _Northeast Nebraska Joint Housing Agency_____ PHA Code: __NE180_____ PHA Type: <input checked="" type="checkbox"/> Small <input checked="" type="checkbox"/> High Performing <input type="checkbox"/> Standard <input checked="" type="checkbox"/> HCV (Section 8) PHA Fiscal Year Beginning: (MM/YYYY): 07/01/2010____					
2.0	Inventory (based on ACC units at time of FY beginning in 1.0 above) Number of PH units: _____ Number of HCV units: __73____					
3.0	Submission Type <input checked="" type="checkbox"/> 5-Year and Annual Plan <input type="checkbox"/> Annual Plan Only <input type="checkbox"/> 5-Year Plan Only					
4.0	PHA Consortia <input type="checkbox"/> PHA Consortia: (Check box if submitting a joint Plan and complete table below.)					
	Participating PHAs	PHA Code	Program(s) Included in the Consortia	Programs Not in the Consortia	No. of Units in Each Program	
	PHA 1:				PH	HCV
	PHA 2:					
	PHA 3:					
5.0	5-Year Plan. Complete items 5.1 and 5.2 only at 5-Year Plan update.					
5.1	Mission. State the PHA's Mission for serving the needs of low-income, very low-income, and extremely low income families in the PHA's jurisdiction for the next five years: To promote adequate, affordable housing, economic opportunity and a suitable living environment for the families we serve without discrimination.					

Goals and Objectives. Identify the PHA's quantifiable goals and objectives that will enable the PHA to serve the needs of low-income and very low-income, and extremely low-income families for the next five years. Include a report on the progress the PHA has made in meeting the goals and objectives described in the previous 5-Year Plan.

GOAL ONE: Manage the Northeast Nebraska Joint Housing Agency's existing public housing program in an efficient and effective manner thereby qualifying at or above standard performance.

OBJECTIVES

1. The Northeast Nebraska Joint Housing Agency shall promote a motivating work environment with a capable and efficient team of employees to operate as a customer-friendly and fiscally prudent leader in the affordable housing industry.
2. The Northeast Nebraska Joint Housing Agency shall strive to sustain an occupancy voucher rate of 95% or balance the calendar year budget constraints set by HUD.
3. HUD shall recognize the Northeast Nebraska Joint Housing Agency as a high performer under SEMAP regulations and is an ongoing goal.
4. To strive and maintain 95% capacity or budgeting, marketing will be utilized through: local newspapers, NNJHA Newsletters, Family Self-Sufficiency Program Coordinating Committee, and offices of cities and villages of service area.
5. If offered by HUD in the future, with continuation of 95% utilization of the rental and homeownership program, submit application for more vouchers if budget factors allow.

GOAL TWO: Assist our communities in increasing the availability of affordable, suitable housing for families in the extremely low-income range, cited as a need of the Consolidated Plan.

OBJECTIVES

1. The Northeast Nebraska Joint Housing Agency will actively recruit high quality landlords to work with our Section 8 Rental Assistance program in providing adequate, affordable housing for the families we serve on an on-going basis.
2. Continually inform clients about TTP and utilities and ways to try to keep utility costs reduced.
3. The HA will partner with communities and with the Nebraska Housing Resources Agency to promote homeownership to very low income homebuyers.
4. The FSS Homeownership Coordinator will keep up to date on courses offered for Homeownership in order to be aware of information available for homeowners.
5. The Housing Agency will promote any affordable housing programs throughout their service region.
6. Review the operating reserves for other intent and purposes use for housing throughout the region.

GOAL THREE: The Northeast Nebraska Joint Housing Agency shall operate in full compliance with all Equal Opportunity laws and regulations and shall ensure equal treatment of all applicants, residents, tenant-based participants, employees, and vendors.

GOAL FOUR: Ensure full compliance with all applicable standards and regulations including government generally accepted accounting practices.

OBJECTIVES

1. The Northeast Nebraska Joint Housing Agency shall plan to operate so that income may exceed expenses.
2. The Northeast Nebraska Joint Housing Agency shall attempt to maintain its operating reserves at acceptable level.
3. The Northeast Nebraska Joint Housing Agency shall assure that all financial reports are reported to HUD in a timely manner on a continual basis.

GOAL FIVE: Enhance the image of public housing in our community.

OBJECTIVES

1. The Northeast Nebraska Joint Housing Agency's commissioners and representatives may give updates to their governing body at least once a year to explain how important this program is to the community.
2. The Northeast Nebraska Joint Housing Agency shall ensure that there are positive relevant stories in their own newsletter(s) and local media when appropriate about the Housing Agency or one of its residents.
3. NNJHA will encourage their Commissioners and Board to expand housing opportunities through the powers of the housing agency.

GOAL SIX: Improve economic opportunity (self-sufficiency) for the families and individuals who reside in our housing.

OBJECTIVES:

1. The Northeast Nebraska Joint Housing Agency will implement partnerships that will enhance services to our residents whenever appropriate.
2. Housing Agency will have a detailed list of lenders, real-estate agencies and other agencies for clients to choose from when starting the homebuyer process.
3. The Family Self Sufficiency participants will have on-going coordinator contact determined by participants' individual needs to set goals and achieve self sufficiency.
4. Housing Agency will continue providing families homeownership.
5. Housing Agency will have escrow accounts maintained for 30% of enrollment of Family Self Sufficiency participants.

GOAL SEVEN: Provide support with local agencies for victims of violence.

OBJECTIVES:

1. Continue collaboration and partnership with local agencies such as domestic violence shelter, Haven House, and Department of Health and Human Services for referrals of needs.
2. Supply pre-application to agencies for immediate action of HA services to provide housing subsequent to sheltering services for enhanced safety.
3. Provide victim/tenants information of other agencies services for maintaining housing such as deposits, utility funds, food pantry.
4. Promote safety awareness or abuse prevention of domestic violence, dating violence, sexual assault, and stalking through HA newsletter to HA tenants, landlords, HA Board and FSS Program Coordinating Committee, and other collaborating partnerships.

Progress Report of Previous 5-year Plan:

The PHA continues use of a 90% payment standard to serve more tenants with HUD funds while reviewing stable market rent costs. Leased vouchers are over 95% usage along with budget usage for continuous goals. A small waiting list starts and stops depending upon turnover. The SEMAP rating has reached the PHA's goal of a "high" rating for two consecutive scorings. Homeownership continues with the partnering marketing and use of USDA-RD and local Housing Resource Agencies. The goal of one homeowner per year has been surpassed. The national magazine 'Rural Voices' published PHA's document on the success of their homeownership with copies distributed to member and other information sent through newsletters. The disabled and elderly use 30% of the vouchers and the PHA continues to serve the 75% of less than 30% low income tenants. The FFS program continues enrollment requirement maximum of 25 participants noted in MTCS, with 50% average having escrow accounts. FSS employment is an element in voucher turnovers to continually help the next needy applicant. Budget management shows revenue over expenses in both the admin fund equity and HAP fund equity along with timely reporting. A local domestic violence shelter contacts our office for housing assistance for DV victims. Applicants are serviced according to the PHA's waiting list rules for admission preference and AFFH.

PHA Plan Update

- (a) Identify all PHA Plan elements that have been revised by the PHA since its last Annual Plan submission:
Not Applicable.
- (b) Identify the specific location(s) where the public may obtain copies of the 5-Year and Annual PHA Plan. For a complete list of PHA Plan elements, see Section 6.0 of the instructions.

Northeast Nebraska Joint Housing Agency, 1122 Pierce Street, P.O. Box 1077, Sioux City, Iowa 51102
Phone (712) 279-6286 Fax (712) 279-6920
Dakota County Clerk, Dakota County Courthouse, Dakota City, NE
Dixon County Clerk, 302 Third Street, Ponca, NE
Allen Village Clerk, 100 East 2nd Street, Allen, NE
Emerson Village Clerk, 210 West Front Street, Emerson, NE
Homer Village Clerk, 110 John Street, Homer, NE
Martinsburg Village Clerk, Martinsburg, NE
Ponca City Clerk, 123 Third Street, Ponca, NE
Wakefield City Clerk, 407 Main Street, Wakefield, NE
Wayne City Clerk, 306 North Pearl Street, Wayne, NE

Plan elements:

13. -VAWA: Domestic Violence is part of our priority list for enrollment. This HA is in partnership with Haven House. They provide shelter and privacy and give referrals for our agency to provide rental assistance to eligible applicants. Any literature is forwarded to our mailing list of tenants and PCC partners. Partner with Department of Health and Human Services for services, referrals or child protection services. (Our VAWA policy included.)

Violence Against Women Act Policy

1.0 Purpose

The purpose of this Policy is to reduce domestic violence, dating violence, and stalking and to prevent homelessness by:

- a) protecting the safety of victims;
- b) creating long-term housing solutions for victims;
- c) building collaborations among victim service providers; and
- d) assisting the Housing Agency (HA) to respond appropriately to the violence while maintaining a safe environment for HA, employees, tenants, applicants and others. The Policy will assist the HA in providing rights under the Violence Against Women Act to its applicants and public housing residents.

2.0 Mission Statement

The HA's policy is to comply with the 2005 VAWA Pub. L. 109-162; Stat.2960 signed into law on January 5, 2006 and codified at 42 U.S.C. § 1437d (I) and 1437f (d), (o) & I and (u). The HA shall not discriminate against an applicant, public housing resident or program participant, on the basis of the rights or privileges provided under the VAWA.

3.0 Definitions

The definitions in this Section apply only to this Policy.

3.1 Confidentiality: Means that the HA will not enter information provided to the HA under 4.2 and 4.3 into a shared database or provide this information to any related entity except as stated in 4.4.

3.2 Dating Violence: Violence committed by a person (a) who is or has been in a social relationship of a romantic or intimate nature with the victim; and (b) where the existence of such a relationship shall be determined based on a consideration of the following factors:

- (i) the length of the relationship;
- (ii) the type of relationship;
- (iii) the frequency of interaction between the persons involved in the relationship. 42 U.S.C. § 1437d (u) (3) (A).

3.3 Domestic Violence: Felony or misdemeanor crimes of violence committed by a current or former spouse of the victim, committed by a person with whom the victim shares a child in common, committed by a person who is cohabitating with or has cohabitated with the victim as a spouse, committed by a person similarly situated to a spouse of the victim under the domestic or family violence laws or committed by any other person against an adult or youth victim who is protected from that person's acts under the domestic or family violence laws.

3.4 Immediate Family Member: A spouse, parent, brother or sister, or child of a victim or an individual to whom the victim stands in loco parent; or any other person living in the household of the victim and related to the victim by blood and marriage. 42 U.S.C. § 1437d (u) (3) (0)

3.5 Long-term Housing: Is housing that is sustainable, accessible, affordable and safe for the foreseeable future which:

- a) the person rents or owns;
- b) is subsidized by a voucher or other program as long as the person meets the eligibility requirements of the program;
- c) directly provided by the HA, is not time limited and the person meets the eligibility requirements of the program.

3.6 Perpetrator: A person who commits an act of domestic violence, dating domestic violence or

stalking against a victim.

3.7 Stalking: (a) to follow, pursue or repeatedly commit acts with the intent to kill, injure, harass or intimidate the victim; (b) to place under surveillance with the intent to kill, injure, harass or intimidate the victim; (c) in the course of, or as a result of such following, pursuit, surveillance, or repeatedly committed acts, to place the victim in reasonable fear of the death of, or serious bodily injury to the victim; or (d) to cause substantial emotional harm to the victim, a member of the immediate family of the victim or the spouse or intimate partner of the victim. 42 U.S.C. § 1437d (u)(3)(C).

3.8 Victim: Is a person who is the victim of domestic violence, dating violence, or stalking under this Policy and who has timely and completely completed the certification under 4.2 and 4.3 or as requested by the HA.

4.0 Certification and Confidentiality

4.1 Failure to Provide Certification Under 4.2 and 4.3 The person shall provide complete and accurate certifications to the HA within 14 business days after the party requests in writing that the person completes the certifications. If the person does not provide a complete and accurate certification within the 14 business days, the HA, the owner or manager may take action to deny or terminate participation or tenancy under: 42 U. S. C. § 1437 I (5) & (6); 42 U. S. C. § 1437 (d) (c) (3); 42 U. S. C. § 1437f (c)(9); 42 U. S. C. § 1437f (d)(1)(B)(ii) & (iii); 42 U. S. C. § 1437f (0)(7)(C) &(0); or 42 U. S. C. § 1437f (0)(20) or for other good cause.

4.2 HUO Approved Certification For each incident that a person is claiming is abuse, the person shall certify to the HA, the victim status by completing a HUD approved certification form. The person shall certify the date, time and description of the incidents, that the incidents are bona fide incidents of actual or threatened abuses and meet the requirements of VAWA and this Policy. The person shall provide information to identify the perpetrator including but not limited to the name and, if known, all alias names, date of birth, address, contact information such as postal, e-mail or internet address, telephone or facsimile number or other information.

4.3 Other Certification

A person who is claiming victim status shall provide to the HA:

- a) documentation signed by the victim and an employee, agent, or volunteer of a victim service provider, an attorney, or a medical professional from whom the victim has sought assistance in addressing domestic violence, dating violence or stalking or the effects of the abuse, in which the professional attests under penalty of perjury (28 U.S.C. § 1746) to the professional's belief that the incident(s) in question are bona fide incidents of abuse; or
- b) a federal, state, tribal, territorial, local police or court record.

4.4 Confidentiality

The HA shall keep all information provided to THE HA under this Section confidential. The HA shall not enter the information into a shared database or provide to any related entity except to the extent that:

- (a) the victim requests or consents to the disclosure in writing;
- (b) the disclosure is required for:
 - (i) eviction from public housing under 42 U. S. C. § 1437 I (5) & (6) (See Section 5 in this Policy);
 - (ii) the disclosure is required by applicable law.

4.5 Compliance Not Sufficient to Constitute Evidence of Unreasonable Act The HA compliance with Sections 4.1, 4.2 and 4.3 shall alone not be sufficient to show evidence of an unreasonable act or omission by them.

5.0 Appropriate Basis for Denial of Admission. Assistance or Tenancy

5. 1 The HA shall not deny participation or admission to the public housing program on the basis of a

person's victim status, if the person otherwise qualifies for admission of assistance.

5.2 An incident or incidents of actual or threatened domestic violence, dating violence, or stalking will not be a serious or repeated violation of the lease by victim and shall not be good cause for denying to a victim admission to a program, or occupancy rights, or evicting a tenant.

5.3 Criminal activity directly related to domestic violence, dating violence, or stalking engaged in by a member of a tenant's household or any guest or other person under the tenant's control shall not be cause for termination of assistance, tenancy, or occupancy rights if the tenant or an immediate member of the tenant's family is the victim of that domestic violence, dating violence or stalking.

5.4 Notwithstanding Sections 5.1, 5.2 and 5.3 the HA, may bifurcate a lease to evict, remove or terminate assistance to any individual who is a tenant or lawful occupant and who engages in criminal acts of physical violence against family members or others without evicting, removing, terminating assistance to or otherwise penalizing the victim of the violence who is also a tenant or lawful occupant. 42 U.S.C. §1437d(I)(6)(B).

5.5 Nothing in Sections 5.1, 5.2 and 5.3 shall limit the authority of the HA, when notified, to honor court orders addressing rights of access to or control of the property, including civil protection orders issued to protect the victim and issued to address the distribution or possession of property among the household members when the family breaks up.

5.6 Nothing in Sections 5.1, 5.2 and 5.3 limits the HA authority to evict or terminate assistance to any tenant for any violation of lease not premised on the act or acts of violence against the tenant or a member of the tenant's household. However the HA may not hold a victim to a more demanding standard.

5.7 Nothing in Sections 5.1, 5.2 and 5.3 limits the HA's authority to evict or terminate assistance, or deny admission to a program if the HA can show an actual and imminent threat to other tenants, neighbors, guests, employees, persons providing service to the property or others if the tenant family is not evicted or terminated from assistance or denied admission.

5.8 Nothing in Sections 5.1, 5.2 or 5.3 limits the HA's authority to deny admission, terminate assistance or evict a person who engages in criminal acts including but not limited to acts of physical violence or stalking against family members or others.

5.9 A public housing tenant who wants a transfer to protect their health or safety and who:

- a) is victim under this Policy;
- b) reasonably believes he or she was imminently threatened by harm from further violence if he or she remains in the unit; and
- c) has complied with all other obligations of the public housing income program may transfer to another HA unit.

6.0 Actions Against a Perpetrator

The HA may evict or deny admission to a program or trespass a perpetrator from its property under this Policy. The victim shall take action to control or prevent the domestic violence, dating violence, or stalking. The action may include but is not limited to:

- a) obtaining and enforcing a restraining or no contact order or order for protection against the perpetrator;
- b) obtaining and enforcing a trespass against the perpetrator;
- c) enforcing the HA or law enforcement's trespass of the perpetrator;
- d) preventing the delivery of the perpetrator's mail to the victim's unit;
- e) providing identifying information listed in 4.2; and
- f) other reasonable measures.

7.0 Notice to Applicants and Tenants.

The HA shall provide notice to applicants and tenants of their rights and obligations under Section 4.4

Confidentiality and Section 5.0 Appropriate Basis for Denial of Admission, Assistance or Tenancy.

8.0 Reporting Requirements

The HA shall include in its Agency Plan, a statement of goals, objectives, policies or programs that will serve the needs of victims when required. THE HA may also include a description of activities, services or programs provided or offered either directly or in partnership with other service providers to victims, to help victims obtain or maintain housing or to prevent the abuse or to enhance the safety of victims.

9.0 Conflict and Scope

This Policy does not enlarge the HA's duty under any law, regulation or ordinance. If this Policy conflicts with the applicable law, regulation or ordinance, the law, regulation or ordinance shall control. If this Policy conflicts with another HA policy, this Policy will control.

10.0 Amendment

The Executive Director may amend this policy when it is reasonably necessary to effectuate the Policy's intent, purpose or interpretation. The proposed amendment along with the rationale for the amendment shall be submitted to the Executive Director for consideration. Where reasonably necessary, the Executive Director may approve the amendment. The amendment shall be effective and incorporated on the date that the Executive Director signs the amendment.

GOALS:

The Housing Authority has teamed with the local community to help support children and adults from violence. If a child is involved, the local office of child protective services will help assist involved, the local office of child protective services will help assist and place the child in a safe environment. If an adult is involved, the City Police Department or County Sheriff's department will assist the adult in getting to the safe harbor. The local Health department also will assist in placing families out of harms way with a contact person who will assist families with counseling services. All referrals will be made on a case-by-case basis.

X -Other

The Northeast Nebraska Joint Housing Agency will provide support with local agencies for victims of violence.

The HA will continue collaboration and partnership with local agencies such as domestic violence shelter, Haven House, and Department of Health and Human Services for referrals of needs.

The HA will supply pre-application to agencies for immediate action of HA services to provide housing subsequent to sheltering services for enhanced safety.

The HA will provide victim/tenants information of other agencies services for maintaining housing such as deposits, utility funds, food pantry.

The HA will promote safety awareness/abuse prevention of domestic violence, dating violence, sexual assault, and stalking through HA newsletter to HA tenants, landlords, HA Board and FSS Program Coordinating Committee, and other collaborating partnerships.

7.0	<p>Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers. <i>Include statements related to these programs as applicable.</i></p> <p>Program Description: Homeownership Legal Authority: Northeast Nebraska Joint Housing Authority (NNJHA) was created in 1988, pursuant to Section 71-1528 R.R. S., Nebraska 1943, to offer rental assistance to those lower income people in the area of the NNJHA.</p> <p>NNJHA services the member Counties of Dakota, Dixon, and Wayne and the Cities and Villages of Allen, Emerson, Homer, Martinsburg, Ponca, Wakefield, and Wayne.</p> <p>Size of Program: The NNJHA Board administers a total of 73 Tenant Based Housing Choice Vouchers. The NNJHA Board prefers to keep the size of the Homeownership Program open in order to allow clients the choice of available housing. Any limitation to the program will be based on HUD and NNJHA approved participation requirements.</p> <p>Pricing the Homes: The purchase price for a home must be appropriate for the income of the homeowner. A review of income will determine whether the monthly mortgage or loan payment is affordable after considering other family expenses.</p> <p>Financing: The families eligible for the homeownership program must secure their own financing. The client will apply for a mortgage through a lending institution. [If purchase of the home is financed (in whole or in part) without FHA insured mortgage financing, NNJHA must require that the underwriting procedures used by the lender comply with the basic mortgage insurance credit underwriting requirements of FHA-insured single family mortgage loans.] NNJHA will allow a balloon payment although most families will not be able to afford that kind of a payment. A variable interest rate mortgage is allowable on a case-by-case review. Due to the instability of variable interest rates, a fixed interest rate will be the more desirable.</p> <p>Homeownership housing assistance will be paid directly to the mortgage holder. The assistance is figured by using a modified voucher program payment standard approach. The Homeownership Assistance payment will equal the lower of (1) the payment standard minus the total tenant payment or (2) the monthly homeownership expenses minus the total tenant payment. The family is responsible for the monthly homeownership expenses not reimbursed by the housing assistance payment. (The total tenant payment is the higher of: the minimum rent, 10 percent of the monthly income, or 30 percent of monthly adjusted income, or the welfare rent) The HA will utilize the utility allowance schedule and payment standard schedule applicable to the Section 8 Voucher Rental Program.</p> <p>A new homeowner participant has the option to choose to receive payment assistance as a down-payment that equals the total that would be paid otherwise for one year of assistance as a one-time lump sum. This lump sum for the one year is based on calculations under HUD guidelines. No further assistance would be provided as a homeowner. This will be available after Congressional approval.</p> <p>The HA must reexamine families income and composition each year and make adjustments to the amount of monthly homeownership assistance.</p> <p>Homeownership assistance will only be paid for a maximum of ten years on a fifteen-year loan and a mandatory term limit of 15 years on a 20-year loan. Exceptions to this rule pertain to Elderly and Disabled Families since they are exempt from subsidy time limits.</p> <p>If the head of household and/or spouse has previously defaulted on a mortgage obtained through the homeownership option, they are barred from receiving future Section 8 Homeownership assistance.</p>
8.0	<p>Capital Improvements. Please complete Parts 8.1 through 8.3, as applicable.</p>
8.1	<p>Capital Fund Program Annual Statement/Performance and Evaluation Report. As part of the PHA 5-Year and Annual Plan, annually complete and submit the <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i>, form HUD-50075.1, for each current and open CFP grant and CFFP financing.</p>
8.2	<p>Capital Fund Program Five-Year Action Plan. As part of the submission of the Annual Plan, PHAs must complete and submit the <i>Capital Fund Program Five-Year Action Plan</i>, form HUD-50075.2, and subsequent annual updates (on a rolling basis, e.g., drop current year, and add latest year for a five year period). Large capital items must be included in the Five-Year Action Plan.</p>
8.3	<p>Capital Fund Financing Program (CFFP). <input type="checkbox"/> Check if the PHA proposes to use any portion of its Capital Fund Program (CFP)/Replacement Housing Factor (RHF) to repay debt incurred to finance capital improvements.</p>

9.0	<p>Housing Needs. Based on information provided by the applicable Consolidated Plan, information provided by HUD, and other generally available data, make a reasonable effort to identify the housing needs of the low-income, very low-income, and extremely low-income families who reside in the jurisdiction served by the PHA, including elderly families, families with disabilities, and households of various races and ethnic groups, and other families who are on the public housing and Section 8 tenant-based assistance waiting lists. The identification of housing needs must address issues of affordability, supply, quality, accessibility, size of units, and location.</p> <p>Based on data from the U.S. Census Bureau, the demographic characteristics of persons residing in Dakota, Dixon and Wayne Counties in Nebraska are comparable and represent the jurisdiction of the PHA.</p> <p>Population of White persons is over 95% with the largest ethnic group being Hispanic. Percentages of families below the poverty levels are: Dakota County, 12.8%; Dixon County, 7.5%; and Wayne County, 7.4%. This compares to 9.2% in the U.S. Percentages of individuals below the poverty levels are as follows: Dakota County, 14.7%; Dixon County, 10.0%; and Wayne County, 14.5%. This compares to 12.4% in the U.S. Percentage of persons ages 65 and older with income below the poverty level are 11% in Dakota County; 9% in Dixon County; and 7.2% in Wayne County. Disabled persons are 8.5% in Dakota County; Dixon County 13.6% and Wayne Counties 19.3%. The average household size is 2.67 in Dakota County; 2.58 in Dixon County; and 2.51 in Wayne County and respective counties' average family size is 3.02, 3.12, and 3.02.</p> <p>Dakota County has 18.5% of the housing stock 70 years old or older; Dixon County is at 52.9% and Wayne County is 37.7%. Older units need more repairs and maintenance, making them unaffordable for a low-income family or individual, the very-low-income family or individual, the extremely-low-income family or individual, the elderly or those persons with disabilities. Older units also cost more to heat and cool. Most of the housing units in the three counties have five or six rooms. Housing units in Dakota County have 5.1% vacancy with vacancies for Dixon County at 7.3% and Wayne Counties at 6.1%. Most of the vacant units are estimated to be substandard and are located in very rural areas. The U.S. vacancy rate is 12% which means more decent housing units are available to buyers and renters.</p> <p>Housing costs for a family or individual should not exceed 25% of the gross income. The percentages of individuals of families paying more than 25% for gross rent in Dakota County is 53.6; it is 44.3% in Dixon County; and it is 54.4% in Wayne County. The percentages for homeowners in Dakota County, Dixon County and Wayne County paying more than 25% of their gross income for mortgage payments is: 42.5%, 19.8%, and 18.9% respectively.</p>
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9.1	<p>Strategy for Addressing Housing Needs. Provide a brief description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. Note: Small, Section 8 only, and High Performing PHAs complete only for Annual Plan submission with the 5-Year Plan.</p> <p>To address the housing needs for families and a waiting list, strategies that the PHA has chosen include continuing the payment standard under HUD guidelines to the available 90% of the established Fair Market Rent. New participants and at annual recertification or at a change of unit, this payment standard applies. By lowering the PHA voucher assistance for participants, more dollars are available to help as many of the base 73 units as possible while keeping within the PHA's annual contribution budget. The market survey of rent costs shows payment standards are within the area's average rent cost for reasonable sized quality units. The PHA services 30% of vouchers for the elderly and disabled. Use of Enterprise Income Verification (EIV) provides data so that terminations of participants who are over income will open a voucher for the waiting list participant. The FSS program encourages the employment income increase to enable next low income participate assistance. If ever able to use the Homeowner Down Payment assistance, it allows another open voucher within a definite time frame as this is a maximum twelve month payment total lump sum under HUD guidelines. The PHA has the option to implement a minimum tenant payment, but low income tenants have very small incomes, if any. Using all of these strategies for turnovers keeps a minimum, if any, waiting list so that the housing needs for our families would be serviced.</p>
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	<p>Additional Information. Describe the following, as well as any additional information HUD has requested.</p> <p>(a) Progress in Meeting Mission and Goals. Provide a brief statement of the PHA's progress in meeting the mission and goals described in the 5- Year Plan.</p> <p>The PHA strives to serve the most tenants with the amount of funding available so that almost 100% of vouchers are used with about 30% of vouchers are used by disabled and elderly. Also racial and ethnic tenants are assisted. The 90% payment standard allows for more families serviced while still meeting rental costs and demand. The PHA continues to serve the 75% of less than 30% low income. A waiting list procedure is in place with starts and stops due to turnovers. PHA's preferences: #1-resident of Nebraska; #2-domestic violence; #3-lowest income with family size; and #4-date and time of applying. Marketing is enhanced through Board members, newsletters, and a recent national magazine publication so that are services are known to the public. The goal of SEMAP status is ranked a "high" with 140/140 scoring consecutively. The PHA's income, expenses, operating reserves and reports show success. The Homeownership program continues in meeting the goals of one homeowner annually. Other partnering agencies are contacted for their services for homeownership. The Family Self Sufficiency program meets the enrollment requirement with escrow accounts. The Admin Plan provides the AFFH addendum as well as the VAWA with files substantiating this information.</p> <p>(b) Significant Amendment and Substantial Deviation/Modification. Provide the PHA's definition of "significant amendment" and "substantial deviation/modification"</p> <p style="padding-left: 40px;">a. Substantial Deviation from the 5-Year Plan</p> <p style="padding-left: 80px;">Reviewed annually and a substantial deviation from the 5-year plan occurs when the Board of Commissioners decides that the Board wants to change the mission statement, goals, or objectives of the 5-year plan.</p> <p style="padding-left: 40px;">b. Significant Amendment or Modification to the Annual Plan</p> <p style="padding-left: 80px;">Annually and at least 45 days before Plan is due, a public hearing is held for comment to include any from the Resident Advisory Board are reviewed also, if any. After submission to HUD for review and approval notification, then is the implementation. Significant amendments or modification to the Annual Plan are defined as discretionary changes in the plans or policies of the housing authority that fundamentally change the plans of the agency and which require formal approval of the Board of Commissioners</p> <p>(c.) Memorandum of Agreement with the Department of Health and Human Services. YES</p>
11.0	<p>Required Submission for HUD Field Office Review. In addition to the PHA Plan template (HUD-50075), PHAs must submit the following documents. Items (a) through (g) may be submitted with signature by mail or electronically with scanned signatures, but electronic submission is encouraged. Items (h) through (i) must be attached electronically with the PHA Plan. Note: Faxed copies of these documents will not be accepted by the Field Office.</p> <p>(a) Form HUD-50077, <i>PHA Certifications of Compliance with the PHA Plans and Related Regulations</i> (which includes all certifications relating to Civil Rights)</p> <p>(b) Form HUD-50070, <i>Certification for a Drug-Free Workplace</i> (PHAs receiving CFP grants only)</p> <p>(c) Form HUD-50071, <i>Certification of Payments to Influence Federal Transactions</i> (PHAs receiving CFP grants only)</p> <p>(d) Form SF-LLL, <i>Disclosure of Lobbying Activities</i> (PHAs receiving CFP grants only)</p> <p>(e) Form SF-LLL-A, <i>Disclosure of Lobbying Activities Continuation Sheet</i> (PHAs receiving CFP grants only)</p> <p>(f) Resident Advisory Board (RAB) comments. Comments received from the RAB must be submitted by the PHA as an attachment to the PHA Plan. PHAs must also include a narrative describing their analysis of the recommendations and the decisions made on these recommendations.</p> <p>(g) Challenged Elements</p> <p>(h) Form HUD-50075.1, <i>Capital Fund Program Annual Statement/Performance and Evaluation Report</i> (PHAs receiving CFP grants only)</p> <p>(i) Form HUD-50075.2, <i>Capital Fund Program Five-Year Action Plan</i> (PHAs receiving CFP grants only)</p>

This information collection is authorized by Section 511 of the Quality Housing and Work Responsibility Act, which added a new section 5A to the U.S. Housing Act of 1937, as amended, which introduced 5-Year and Annual PHA Plans. The 5-Year and Annual PHA plans provide a ready source for interested parties to locate basic PHA policies, rules, and requirements concerning the PHA's operations, programs, and services, and informs HUD, families served by the PHA, and members of the public of the PHA's mission and strategies for serving the needs of low-income and very low-income families. This form is to be used by all PHA types for submission of the 5-Year and Annual Plans to HUD. Public reporting burden for this information collection is estimated to average 12.68 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. HUD may not collect this information, and respondents are not required to complete this form, unless it displays a currently valid OMB Control Number.

Privacy Act Notice. The United States Department of Housing and Urban Development is authorized to solicit the information requested in this form by virtue of Title 12, U.S. Code, Section 1701 et seq., and regulations promulgated thereunder at Title 12, Code of Federal Regulations. Responses to the collection of information are required to obtain a benefit or to retain a benefit. The information requested does not lend itself to confidentiality

Instructions form HUD-50075

Applicability. This form is to be used by all Public Housing Agencies (PHAs) with Fiscal Year beginning April 1, 2008 for the submission of their 5-Year and Annual Plan in accordance with 24 CFR Part 903. The previous version may be used only through April 30, 2008.

1.0 PHA Information

Include the full PHA name, PHA code, PHA type, and PHA Fiscal Year Beginning (MM/YYYY).

2.0 Inventory

Under each program, enter the number of Annual Contributions Contract (ACC) Public Housing (PH) and Section 8 units (HCV).

3.0 Submission Type

Indicate whether this submission is for an Annual and Five Year Plan, Annual Plan only, or 5-Year Plan only.

4.0 PHA Consortia

Check box if submitting a Joint PHA Plan and complete the table.

5.0 Five-Year Plan

Identify the PHA's Mission, Goals and/or Objectives (24 CFR 903.6). Complete only at 5-Year update.

5.1 Mission. A statement of the mission of the public housing agency for serving the needs of low-income, very low-income, and extremely low-income families in the jurisdiction of the PHA during the years covered under the plan.

5.2 Goals and Objectives. Identify quantifiable goals and objectives that will enable the PHA to serve the needs of low income, very low-income, and extremely low-income families.

6.0 PHA Plan Update. In addition to the items captured in the Plan template, PHAs must have the elements listed below readily available to the public. Additionally, a PHA must:

- (a) Identify specifically which plan elements have been revised since the PHA's prior plan submission.
- (b) Identify where the 5-Year and Annual Plan may be obtained by the public. At a minimum, PHAs must post PHA Plans, including updates, at each Asset Management Project (AMP) and main office or central office of the PHA. PHAs are strongly encouraged to post complete PHA Plans on its official website. PHAs are also encouraged to provide each resident council a copy of its 5-Year and Annual Plan.

PHA Plan Elements. (24 CFR 903.7)

1. **Eligibility, Selection and Admissions Policies, including Deconcentration and Wait List Procedures.** Describe the PHA's policies that govern resident or tenant eligibility, selection and admission including admission preferences for both public housing and HCV and unit assignment policies for public housing; and procedures for maintaining waiting lists for admission to public housing and address any site-based waiting lists.

2. **Financial Resources.** A statement of financial resources, including a listing by general categories, of the PHA's anticipated resources, such as PHA Operating, Capital and other anticipated Federal resources available to the PHA, as well as tenant rents and other income available to support public housing or tenant-based assistance. The statement also should include the non-Federal sources of funds supporting each Federal program, and state the planned use for the resources.
3. **Rent Determination.** A statement of the policies of the PHA governing rents charged for public housing and HCV dwelling units.
4. **Operation and Management.** A statement of the rules, standards, and policies of the PHA governing maintenance management of housing owned, assisted, or operated by the public housing agency (which shall include measures necessary for the prevention or eradication of pest infestation, including cockroaches), and management of the PHA and programs of the PHA.
5. **Grievance Procedures.** A description of the grievance and informal hearing and review procedures that the PHA makes available to its residents and applicants.
6. **Designated Housing for Elderly and Disabled Families.** With respect to public housing projects owned, assisted, or operated by the PHA, describe any projects (or portions thereof), in the upcoming fiscal year, that the PHA has designated or will apply for designation for occupancy by elderly and disabled families. The description shall include the following information: **1)** development name and number; **2)** designation type; **3)** application status; **4)** date the designation was approved, submitted, or planned for submission, and; **5)** the number of units affected.
7. **Community Service and Self-Sufficiency.** A description of: **(1)** Any programs relating to services and amenities provided or offered to assisted families; **(2)** Any policies or programs of the PHA for the enhancement of the economic and social self-sufficiency of assisted families, including programs under Section 3 and FSS; **(3)** How the PHA will comply with the requirements of community service and treatment of income changes resulting from welfare program requirements. **(Note: applies to only public housing).**
8. **Safety and Crime Prevention.** For public housing only, describe the PHA's plan for safety and crime prevention to ensure the safety of the public housing residents. The statement must include: **(i)** A description of the need for measures to ensure the safety of public housing residents; **(ii)** A description of any crime prevention activities conducted or to be conducted by the PHA; and **(iii)** A description of the coordination between the PHA and the appropriate police precincts for carrying out crime prevention measures and activities.

9. **Pets.** A statement describing the PHAs policies and requirements pertaining to the ownership of pets in public housing.

10. **Civil Rights Certification.** A PHA will be considered in compliance with the Civil Rights and AFFH Certification if: it can document that it examines its programs and proposed programs to identify any impediments to fair housing choice within those programs; addresses those impediments in a reasonable fashion in view of the resources available; works with the local jurisdiction to implement any of the jurisdiction's initiatives to affirmatively further fair housing; and assures that the annual plan is consistent with any applicable Consolidated Plan for its jurisdiction.

11. **Fiscal Year Audit.** The results of the most recent fiscal year audit for the PHA.

12. **Asset Management.** A statement of how the agency will carry out its asset management functions with respect to the public housing inventory of the agency, including how the agency will plan for the long-term operating, capital investment, rehabilitation, modernization, disposition, and other needs for such inventory.

13. **Violence Against Women Act (VAWA).** A description of: 1) Any activities, services, or programs provided or offered by an agency, either directly or in partnership with other service providers, to child or adult victims of domestic violence, dating violence, sexual assault, or stalking; 2) Any activities, services, or programs provided or offered by a PHA that helps child and adult victims of domestic violence, dating violence, sexual assault, or stalking, to obtain or maintain housing; and 3) Any activities, services, or programs provided or offered by a public housing agency to prevent domestic violence, dating violence, sexual assault, and stalking, or to enhance victim safety in assisted families.

7.0 Hope VI, Mixed Finance Modernization or Development, Demolition and/or Disposition, Conversion of Public Housing, Homeownership Programs, and Project-based Vouchers

(a) Hope VI or Mixed Finance Modernization or Development.

1) A description of any housing (including project number (if known) and unit count) for which the PHA will apply for HOPE VI or Mixed Finance Modernization or Development; and 2) A timetable for the submission of applications or proposals. The application and approval process for Hope VI, Mixed Finance Modernization or Development, is a separate process. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/programs/ph/hope6/index.cfm>

(b) Demolition and/or Disposition.

With respect to public housing projects owned by the PHA and subject to ACCs under the Act: (1) A description of any housing (including project number and unit numbers [or addresses]), and the number of affected units along with their sizes and accessibility features) for which the PHA will apply or is currently pending for demolition or disposition; and (2) A timetable for the demolition or disposition. The application and approval process for demolition and/or disposition is a separate process. See guidance on HUD's website at:

http://www.hud.gov/offices/pih/centers/sac/demo_dispo/index.cfm

Note: This statement must be submitted to the extent that approved and/or pending demolition and/or disposition has changed.

(c) Conversion of Public Housing.

With respect to public housing owned by a PHA: 1) A description of any building or buildings (including project number and unit count) that the PHA is required to convert to tenant-based assistance or

that the public housing agency plans to voluntarily convert; 2) An analysis of the projects or buildings required to be converted; and 3) A statement of the amount of assistance received under this chapter to be used for rental assistance or other housing assistance in connection with such conversion. See guidance on HUD's website at:

<http://www.hud.gov/offices/pih/centers/sac/conversion.cfm>

(d) **Homeownership.** A description of any homeownership (including project number and unit count) administered by the agency or for which the PHA has applied or will apply for approval.

(e) **Project-based Vouchers.** If the PHA wishes to use the project-based voucher program, a statement of the projected number of project-based units and general locations and how project basing would be consistent with its PHA Plan.

8.0 **Capital Improvements.** This section provides information on a PHA's Capital Fund Program. With respect to public housing projects owned, assisted, or operated by the public housing agency, a plan describing the capital improvements necessary to ensure long-term physical and social viability of the projects must be completed along with the required forms. Items identified in 8.1 through 8.3, must be signed where directed and transmitted electronically along with the PHA's Annual Plan submission.

8.1 **Capital Fund Program Annual Statement/Performance and Evaluation Report.** PHAs must complete the *Capital Fund Program Annual Statement/Performance and Evaluation Report* (form HUD-50075.1), for each Capital Fund Program (CFP) to be undertaken with the current year's CFP funds or with CFFP proceeds. Additionally, the form shall be used for the following purposes:

- (a) To submit the initial budget for a new grant or CFFP;
- (b) To report on the Performance and Evaluation Report progress on any open grants previously funded or CFFP; and
- (c) To record a budget revision on a previously approved open grant or CFFP, e.g., additions or deletions of work items, modification of budgeted amounts that have been undertaken since the submission of the last Annual Plan. The Capital Fund Program Annual Statement/Performance and Evaluation Report must be submitted annually.

Additionally, PHAs shall complete the Performance and Evaluation Report section (see footnote 2) of the *Capital Fund Program Annual Statement/Performance and Evaluation* (form HUD-50075.1), at the following times:

- 1. At the end of the program year; until the program is completed or all funds are expended;
- 2. When revisions to the Annual Statement are made, which do not require prior HUD approval, (e.g., expenditures for emergency work, revisions resulting from the PHAs application of fungibility); and
- 3. Upon completion or termination of the activities funded in a specific capital fund program year.

8.2 Capital Fund Program Five-Year Action Plan

PHAs must submit the *Capital Fund Program Five-Year Action Plan* (form HUD-50075.2) for the entire PHA portfolio for the first year of participation in the CFP and annual update thereafter to eliminate the previous year and to add a new fifth year (rolling basis) so that the form always covers the present five-year period beginning with the current year.

8.3 **Capital Fund Financing Program (CFFP).** Separate, written HUD approval is required if the PHA proposes to pledge any

portion of its CFP/RHF funds to repay debt incurred to finance capital improvements. The PHA must identify in its Annual and 5-year capital plans the amount of the annual payments required to service the debt. The PHA must also submit an annual statement detailing the use of the CFFP proceeds. See guidance on HUD's website at:
<http://www.hud.gov/offices/pih/programs/ph/capfund/cffp.cfm>

9.0 Housing Needs. Provide a statement of the housing needs of families residing in the jurisdiction served by the PHA and the means by which the PHA intends, to the maximum extent practicable, to address those needs. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

9.1 Strategy for Addressing Housing Needs. Provide a description of the PHA's strategy for addressing the housing needs of families in the jurisdiction and on the waiting list in the upcoming year. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**

10.0 Additional Information. Describe the following, as well as any additional information requested by HUD:

- (a) **Progress in Meeting Mission and Goals.** PHAs must include (i) a statement of the PHAs progress in meeting the mission and goals described in the 5-Year Plan; (ii) the basic criteria the PHA will use for determining a significant amendment from its 5-year Plan; and a significant amendment or modification to its 5-Year Plan and Annual Plan. **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan).**
- (b) **Significant Amendment and Substantial Deviation/Modification.** PHA must provide the definition of "significant amendment" and "substantial deviation/modification". **(Note: Standard and Troubled PHAs complete annually; Small and High Performers complete only for Annual Plan submitted with the 5-Year Plan.)**

- (c) PHAs must include or reference any applicable memorandum of agreement with HUD or any plan to improve performance. **(Note: Standard and Troubled PHAs complete annually).**

11.0 Required Submission for HUD Field Office Review. In order to be a complete package, PHAs must submit items (a) through (g), with signature by mail or electronically with scanned signatures. Items (h) and (i) shall be submitted electronically as an attachment to the PHA Plan.

- (a) Form HUD-50077, *PHA Certifications of Compliance with the PHA Plans and Related Regulations*
- (b) Form HUD-50070, *Certification for a Drug-Free Workplace (PHAs receiving CFP grants only)*
- (c) Form HUD-50071, *Certification of Payments to Influence Federal Transactions (PHAs receiving CFP grants only)*
- (d) Form SF-LLL, *Disclosure of Lobbying Activities (PHAs receiving CFP grants only)*
- (e) Form SF-LLL-A, *Disclosure of Lobbying Activities Continuation Sheet (PHAs receiving CFP grants only)*
- (f) Resident Advisory Board (RAB) comments.
- (g) Challenged Elements. Include any element(s) of the PHA Plan that is challenged.
- (h) Form HUD-50075.1, *Capital Fund Program Annual Statement/Performance and Evaluation Report (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.1.
- (i) Form HUD-50075.2, *Capital Fund Program Five-Year Action Plan (Must be attached electronically for PHAs receiving CFP grants only)*. See instructions in 8.2.

PHA Certifications of Compliance with PHA Plans and Related Regulations	U.S. Department of Housing and Urban Development Office of Public and Indian Housing OMB No. 2577-0226 Expires 4/30/2011
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**PHA Certifications of Compliance with the PHA Plans and Related Regulations:
Board Resolution to Accompany the PHA 5-Year and Annual PHA Plan**

Acting on behalf of the Board of Commissioners of the Public Housing Agency (PHA) listed below, as its Chairman or other authorized PHA official if there is no Board of Commissioners, I approve the submission of the ☒ 5-Year and/or ☒ Annual PHA Plan for the PHA fiscal year beginning July 1, 2010, hereinafter referred to as "the Plan", of which this document is a part and make the following certifications and agreements with the Department of Housing and Urban Development (HUD) in connection with the submission of the Plan and implementation thereof:

1. The Plan is consistent with the applicable comprehensive housing affordability strategy (or any plan incorporating such strategy) for the jurisdiction in which the PHA is located.
2. The Plan contains a certification by the appropriate State or local officials that the Plan is consistent with the applicable Consolidated Plan, which includes a certification that requires the preparation of an Analysis of Impediments to Fair Housing Choice, for the PHA's jurisdiction and a description of the manner in which the PHA Plan is consistent with the applicable Consolidated Plan.
3. The PHA certifies that there has been no change, significant or otherwise, to the Capital Fund Program (and Capital Fund Program/Replacement Housing Factor) Annual Statement(s), since submission of its last approved Annual Plan. The Capital Fund Program Annual Statement/Annual Statement/Performance and Evaluation Report must be submitted annually even if there is no change.
4. The PHA has established a Resident Advisory Board or Boards, the membership of which represents the residents assisted by the PHA, consulted with this Board or Boards in developing the Plan, and considered the recommendations of the Board or Boards (24 CFR 903.13). The PHA has included in the Plan submission a copy of the recommendations made by the Resident Advisory Board or Boards and a description of the manner in which the Plan addresses these recommendations.
5. The PHA made the proposed Plan and all information relevant to the public hearing available for public inspection at least 45 days before the hearing, published a notice that a hearing would be held and conducted a hearing to discuss the Plan and invited public comment.
6. The PHA certifies that it will carry out the Plan in conformity with Title VI of the Civil Rights Act of 1964, the Fair Housing Act, section 504 of the Rehabilitation Act of 1973, and title II of the Americans with Disabilities Act of 1990.
7. The PHA will affirmatively further fair housing by examining their programs or proposed programs, identify any impediments to fair housing choice within those programs, address those impediments in a reasonable fashion in view of the resources available and work with local jurisdictions to implement any of the jurisdiction's initiatives to affirmatively further fair housing that require the PHA's involvement and maintain records reflecting these analyses and actions.
8. For PHA Plan that includes a policy for site based waiting lists:
 - The PHA regularly submits required data to HUD's 50058 PIC/IMS Module in an accurate, complete and timely manner (as specified in PIH Notice 2006-24);
 - The system of site-based waiting lists provides for full disclosure to each applicant in the selection of the development in which to reside, including basic information about available sites; and an estimate of the period of time the applicant would likely have to wait to be admitted to units of different sizes and types at each site;
 - Adoption of site-based waiting list would not violate any court order or settlement agreement or be inconsistent with a pending complaint brought by HUD;
 - The PHA shall take reasonable measures to assure that such waiting list is consistent with affirmatively furthering fair housing;
 - The PHA provides for review of its site-based waiting list policy to determine if it is consistent with civil rights laws and certifications, as specified in 24 CFR part 903.7(c)(1).
9. The PHA will comply with the prohibitions against discrimination on the basis of age pursuant to the Age Discrimination Act of 1975.
10. The PHA will comply with the Architectural Barriers Act of 1968 and 24 CFR Part 41, Policies and Procedures for the Enforcement of Standards and Requirements for Accessibility by the Physically Handicapped.
11. The PHA will comply with the requirements of section 3 of the Housing and Urban Development Act of 1968, Employment Opportunities for Low-or Very-Low Income Persons, and with its implementing regulation at 24 CFR Part 135.
12. The PHA will comply with acquisition and relocation requirements of the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970 and implementing regulations at 49 CFR Part 24 as applicable.

13. The PHA will take appropriate affirmative action to award contracts to minority and women's business enterprises under 24 CFR 5.105(a).
14. The PHA will provide the responsible entity or HUD any documentation that the responsible entity or HUD needs to carry out its review under the National Environmental Policy Act and other related authorities in accordance with 24 CFR Part 58 or Part 50, respectively.
15. With respect to public housing the PHA will comply with Davis-Bacon or HUD determined wage rate requirements under Section 12 of the United States Housing Act of 1937 and the Contract Work Hours and Safety Standards Act.
16. The PHA will keep records in accordance with 24 CFR 85.20 and facilitate an effective audit to determine compliance with program requirements.
17. The PHA will comply with the Lead-Based Paint Poisoning Prevention Act, the Residential Lead-Based Paint Hazard Reduction Act of 1992, and 24 CFR Part 35.
18. The PHA will comply with the policies, guidelines, and requirements of OMB Circular No. A-87 (Cost Principles for State, Local and Indian Tribal Governments), 2 CFR Part 225, and 24 CFR Part 85 (Administrative Requirements for Grants and Cooperative Agreements to State, Local and Federally Recognized Indian Tribal Governments).
19. The PHA will undertake only activities and programs covered by the Plan in a manner consistent with its Plan and will utilize covered grant funds only for activities that are approvable under the regulations and included in its Plan.
20. All attachments to the Plan have been and will continue to be available at all times and all locations that the PHA Plan is available for public inspection. All required supporting documents have been made available for public inspection along with the Plan and additional requirements at the primary business office of the PHA and at all other times and locations identified by the PHA in its PHA Plan and will continue to be made available at least at the primary business office of the PHA.
21. The PHA provides assurance as part of this certification that:
 - (i) The Resident Advisory Board had an opportunity to review and comment on the changes to the policies and programs before implementation by the PHA;
 - (ii) The changes were duly approved by the PHA Board of Directors (or similar governing body); and
 - (iii) The revised policies and programs are available for review and inspection, at the principal office of the PHA during normal business hours.
22. The PHA certifies that it is in compliance with all applicable Federal statutory and regulatory requirements.

Northeast Nebraska Joint Housing Agency

NE180

PHA Name

PHA Number/HA Code

x _____ 5-Year PHA Plan for Fiscal Years 20¹⁰ - 20¹⁴
 x _____ Annual PHA Plan for Fiscal Years 20¹⁰ - 20¹¹

I hereby certify that all the information stated herein, as well as any information provided in the accompaniment herewith, is true and accurate. **Warning:** HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

Name of Authorized Official	Title
<i>Jane E. Gilbert</i>	<i>Executive Director</i>
Signature	Date
<i>Jane E Gilbert</i>	<i>2/17/2010</i>

Northeast Nebraska Joint Housing Agency

ne180bv01

ATTACHMENT b

Resident Advisory Board Comment

No comments were received from RAB at February 17, 2010 Board of Director's meeting or the Public Hearing of January 20, 2010.